

# Executive Branch Personnel

## Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

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**White, Caroline Lee**

Assistant to the General Counsel, Department of Health & Human Services

Date of Appointment: 01/02/2018

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

**/s/ White, Caroline Lee [electronically signed on 08/27/2017 by White, Caroline Lee in Integrity.gov]**

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

**/s/ Olesh, Stanley, Certifying Official [electronically signed on 02/08/2018 by Olesh, Stanley in Integrity.gov]**

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Other review conducted by

**/s/ Lee, Steven, Ethics Official [electronically signed on 09/12/2017 by Lee, Steven in Integrity.gov]**

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U.S. Office of Government Ethics Certification

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Data Revised 02/08/2018

Data Revised 01/11/2018

Data Revised 01/10/2018

Data Revised 01/05/2018

Data Revised 09/25/2017

Data Revised 09/14/2017

Data Revised 09/13/2017

Data Revised 09/12/2017

Data Revised 08/31/2017

Data Revised 08/30/2017

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Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(01/05/2018, Olesh, Stanley): 9/18/17 -- cleared for position -- SO
N/A	N/A	General	(01/05/2018, Olesh, Stanley): 9/22/17 - rec'd signed Ethics Agreement -- SO
N/A	N/A	General	(01/11/2018, Olesh, Stanley): 1/10/18 -- filer updated form as of start date & relayed information on sales after start date. Most holdings listed on EA have already been sold -- SO

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(02/08/2018, Olesh, Stanley): 2/6 - rec'd confirmation of sale of remaining holdings on EA divestiture list -- SO

## 1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Greenberg Traurig LLP	Washington, District of Columbia	Law Firm	Secretary	7/2013	12/2017

## 2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Greenberg Traurig LLP	N/A		Salary	\$128,800
2	Greenberg Traurig 401(k)	No			
2.1	SSga S&P 500 Index Non-Lending Ser	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.2	SSga RussellSmall/Mid Cap NL C	Yes	\$1,001 - \$15,000		None (or less than \$201)
2.3	Dodge & Cox International Stock	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	Charles Schwab IRA	No			
3.1	Schwab U.S. Broad Market ETF (SCHB)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.2	Schwab U.S. Dividend Equity ETF (SCHD)	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
3.3	Schwab U.S. Large-Cap Growth ETF (SCHG)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.4	Financial Select Sector SPDR Fund (XLF)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.5	American Funds Fundamental Investors A (ANCFX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.6	American Funds Washington Mutual A (AWSHX)	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.7	Fidelity Select Chemicals-IRA (FSCHX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.8	Janus Henderson Enterprise fund (JAENX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.9	Schwab S&P 500 Index (SWPPX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3.10	Schwab Small-Cap Equity (SWSCX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.11	Schwab International Equity ETF (SCHF)	Yes	\$1,001 - \$15,000		None (or less than \$201)

### 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Greenberg Traurig LLP	Washington, District of Columbia	I will continue to participate in this defined contribution plan, but the plan sponsor will no longer make contributions.	7/2013

### 4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Greenberg Traurig LLP	Washington, District of Columbia	Secretary

## 5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Law Office of Bernard Wunder (Legal)	N/A		legal fees (solo legal practice)	
2	IRA #1	No			
2.1	AT&T (T)	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$201 - \$1,000
2.2	Bank of America Corp (BAC)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$201 - \$1,000
2.3	Bristol Myers Squibb (BMY)	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$1,001 - \$2,500
2.4	Gold Corp (GG)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.5	Intrexon (XON)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.6	KKR & Co (KKR)	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$1,001 - \$2,500
2.7	Kroger Co (KR) (SOLD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
2.8	Penske Auto Group (PAG)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$201 - \$1,000
2.9	Pfizer Inc (PFE) (SOLD)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
2.10	The Carlyle Group (CG)	N/A	\$15,001 - \$50,000		\$2,501 - \$5,000
2.11	Verizon Communications Inc (VZ)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2.12	Vodafone (VOD)	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$1,001 - \$2,500
2.13	Western Union Co (WU)	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$1,001 - \$2,500
2.14	ZIOPHARM Oncology Inc (ZIOP)	N/A	\$15,001 - \$50,000		None (or less than \$201)
2.15	Money Market Funds	N/A	\$100,001 - \$250,000		None (or less than \$201)
2.16	AT&T options - 4 sh @38, exp. 4/20/18	N/A	None (or less than \$1,001)		None (or less than \$201)
2.17	Bank of America Corp. options - 5 sh. @24, exp. 1/19/18	N/A	None (or less than \$1,001)		None (or less than \$201)
2.18	Bristol-Myers Squibb options - 5 sh. @ 60, exp. 1/19/18	N/A	None (or less than \$1,001)		None (or less than \$201)
2.19	Goldcorp Inc options - 12 sh. @14, exp. 1/19/18	N/A	None (or less than \$1,001)		None (or less than \$201)
2.20	VanEck Vectors Gold Mine options - 8 sh. @ 26, exp. 1/19/18	N/A	None (or less than \$1,001)		None (or less than \$201)
2.21	Verizon Communications options - 3 sh. @ 46, exp. 1/19/18	N/A	None (or less than \$1,001)		None (or less than \$201)
2.22	Western Union Co options - 12 sh. @ 20, exp. 1/19/18	N/A	\$1,001 - \$15,000		None (or less than \$201)
2.23	VanEck Gold Miners E (GDX)	Yes	\$15,001 - \$50,000		None (or less than \$201)
3	IRA #2 (Ohio Nat'l Financial variable annuity)	No			
3.1	ON S&P 500(R) Index Portfolio	Yes	\$250,001 - \$500,000		None (or less than \$201)
3.2	Janus Aspen Series Balanced Portfolio	Yes	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.3	Janus Aspen Series Overseas Portfolio	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.4	Fidelity VIP MidCap Portfolio	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.5	PIMCO Real Return Portfolio	Yes	\$250,001 - \$500,000		None (or less than \$201)
3.6	Fidelity VIP Contrafund Portfolio	Yes	\$500,001 - \$1,000,000		None (or less than \$201)
3.7	JP Morgan Trust Mid Cap Value Portfolio	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.8	Royce Micro-Cap Portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)
3.9	PIMCO Total Return Portfolio	Yes	\$100,001 - \$250,000		None (or less than \$201)
3.10	Royce Small-Cap Portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)
4	MetLife Preference Plus Account variable annuity	No			
4.1	Fixed Account	N/A	\$1,001 - \$15,000		None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Cognizant Technology Solutions Corporation (SOLD)	N/A	None (or less than \$1,001)	Capital Gains	\$201 - \$1,000
2	Exxon Mobil Corp (SOLD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3	Activision Blizzard, Inc (SOLD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
4	Anheuser-Busch (SOLD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
5	Arconic, Inc.	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$1,001 - \$2,500
6	BP PLC (SOLD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
7	Capital One Financial	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$1,001 - \$2,500
8	CSX Corp (SOLD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
9	Hilton Worldwide	N/A	\$1,001 - \$15,000	Dividends Capital Gains	\$1,001 - \$2,500
10	Invesco Ltd	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$2,501 - \$5,000
11	MGM Resorts	N/A	\$15,001 - \$50,000	Dividends Capital Gains	\$2,501 - \$5,000
12	Microsoft Corp (SOLD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$2,501 - \$5,000
13	Ford Motor Company (SOLD)	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$201 - \$1,000
14	Lincoln Annuity	No			
14.1	American Funds Growth	Yes	\$50,001 - \$100,000		None (or less than \$201)
14.2	American Funds Growth-Income	Yes	\$50,001 - \$100,000		None (or less than \$201)
14.3	Fidelity Contrafund	Yes	\$50,001 - \$100,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14.4	American Funds Global Growth	Yes	\$15,001 - \$50,000		None (or less than \$201)
15	Brighthouse variable annuity	No			
15.1	BlackRock Global Tactical Strategies Portfolio	Yes	Over \$1,000,000		None (or less than \$201)
16	Federated Muni Ultrashort A	Yes	\$100,001 - \$250,000		\$201 - \$1,000
17	Ivy Global Natural Resources	Yes	\$1,001 - \$15,000		None (or less than \$201)
18	Van Eck Vectors Gold Miners fund	Yes	\$15,001 - \$50,000		\$201 - \$1,000
19	Washington First Bank	No	\$50,001 - \$100,000		None (or less than \$201)
20	Janus Global Life Sciences (SOLD)	Yes	None (or less than \$1,001)		\$201 - \$1,000
21	American Funds EuroPacific Gr A	Yes	\$15,001 - \$50,000		\$15,001 - \$50,000
22	U.S. brokerage account #1	No			
22.1	Fidelity Select Chemicals	Yes	\$1,001 - \$15,000		None (or less than \$201)
22.2	IShares Russell 2000 fund (IWM)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
22.3	Cash account	N/A	\$1,001 - \$15,000		None (or less than \$201)
22.4	Schwab International Equity ETF (SCHF)	Yes	\$1,001 - \$15,000		None (or less than \$201)
23	Suntrust Money Market account	N/A	\$100,001 - \$250,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
24	US checking/savings account	N/A	\$15,001 - \$50,000		None (or less than \$201)
25	US brokerage acct # 2 (estate)	No			
25.1	bank sweep acct (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
25.2	Schwab International Small Cap ETF (SCHC)	Yes	\$1,001 - \$15,000		None (or less than \$201)
25.3	Schwab 1000 Index ETF (SCHK)	Yes	\$15,001 - \$50,000		None (or less than \$201)
25.4	Vanguard FTSE All World Ex-US ETF	Yes	\$15,001 - \$50,000		None (or less than \$201)
25.5	American Funds Washington Mutual Fnd (AWSHX)	Yes	\$50,001 - \$100,000		None (or less than \$201)

## 7. Transactions

(N/A) - Not required for this type of report

## 8. Liabilities

None

## 9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

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# Endnotes

# Summary of Contents

## 1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

## 2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## 3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

#### **4. Filer's Sources of Compensation Exceeding \$5,000 in a Year**

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

#### **5. Spouse's Employment Assets & Income and Retirement Accounts**

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

#### **6. Other Assets and Income**

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

#### **7. Transactions**

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

## **8. Liabilities**

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

## **9. Gifts and Travel Reimbursements**

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

## Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

## Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).

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